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(Additional counsel information omitted)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

V.

**COMCAST CORPORATION;
COMCAST CABLE
COMMUNICATIONS, LLC; AND
COMCAST CABLE
COMMUNICATIONS MANAGEMENT,
LLC,**

Defendants.

**No. 2:23-cv-1049-JWH-KES (Lead Case)
No. 2:23-cv-1050-JWH-KES (Related Case)**

**No. 2:23-cv-1043-JWH-KES (Lead Case)
No. 2:23-cv-1048-JWH-KES
(Related Case)**

Assigned to Hon. John W. Holcomb

**DECLARATION OF KRISHNAN
PADMANABHAN IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS SECOND AMENDED
COMPLAINT UNDER FED. R.
CIV. P. 12(b)(1) AND 12(b)(6)**

1 I, Krishnan Padmanabhan, hereby declare as follows:

2 1. I am an attorney at law duly licensed to practice in the State of California.
3 I am an attorney with Winston & Strawn LLP and counsel for defendants Comcast
4 Corporation, Comcast Cable Communications, LLC, and Comcast Cable
5 Communications Management, LLC (collectively “Defendants” or “Comcast”). I have
6 knowledge of the following and, if called as a witness, could and would testify
7 competently to the contents of this declaration.

8 2. Attached as **Exhibit A** is a true and correct copy of a cross reference chart
9 comparing the 1043 and 1049 Second Amended Complaint (“SAC”) allegations,
10 prepared by counsel for Comcast.

11 3. Attached as **Exhibit B** is a true and correct copy of a cross reference chart
12 comparing the SAC, “corrected” SAC, and, as applicable, Third Amended Complaint
13 (“TAC”) allegations prepared by counsel for Comcast.

14 4. Attached as **Exhibit C** is a true and correct copy of the assignment of U.S.
15 Patent No. 9,866,438.

16 5. Attached as **Exhibit D** is a true and correct copy of U.S. Patent No. 11,
17 785,275.

18 6. Attached as **Exhibit E** is a true and correct copy of an email sent from
19 Samuel Richey on October 29, 2023.

20 7. Attached as **Exhibit F** is a true and correct copy of an email sent from
21 Raquel Baccus on November 3, 2023.

22 8. Attached as **Exhibit G** is a true and correct copy of the Third Amended
23 Complaint filed in *Core Optical Techs., LLC v. Juniper Networks Inc.*, Case No. 21-cv-
24 02428-SK, 562 F. Supp. 3d 376 (N.D. Cal. 2021).

25 9. Attached as **Exhibit H** is a true and correct copy of an April 27, 2022 New
26 York Times Article cited in the SAC.

27 10. Attached as **Exhibit I** is a true and correct copy of a document produced
28 in connection with this litigation, bates labeled MOCA_1038720-1.

11. Attached as **Exhibit J** is a true and correct copy of the MoCA Intellectual Property Rights Policy v1.1 dated December 2003.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 29th day of December, 2023 in New York, NY.

Dated: December 29, 2023

WINSTON & STRAWN LLP

By: /s/ Krishnan Padmanabhan
Krishnan Padmanabhan